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6385 S. Rainbow Boulevard, Suite 600  
5 Las Vegas, Nevada 89118  
Tel.: 702.893.3383  
6 Fax: 702.893.3789  
*Attorneys for Defendant*  
7 *Correct Care Solutions, LLC*

8  
9 UNITED STATES DISTRICT COURT  
10 DISTRICT OF NEVADA  
11

12 ROSEN MARIANO, An individual,  
13 Plaintiff,  
14 vs.

15 THE CITY OF LAS VEGAS, a political  
subdivision of the State of Nevada,  
16 CORRECTIONAL HEALTHCARE  
COMPANIES, INC., A Foreign Corporation,  
CORRECT CARE SOLUTIONS LLC, A  
17 Foreign Limited Liability Company,  
MICHELLE FREEMAN, Chief of Detention  
18 Enforcement for the City of Las Vegas,  
CORRECTION OFFICER DOE 1-10,  
19 HEALTHCARE WORKER DOES 11-20,  
DOES 21-99 inclusive, ROE  
20 CORPORATIONS 100-199, inclusive,  
21 Defendants.  
22

Case No. 2:18-cv-01911-APG-GWF

**STIPULATION TO CONTINUE  
DEFENDANT'S REPLY TO  
PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION FOR  
SUMMARY JUDGMENT [DOC 51 and  
Doc 55]**

23 The parties, by and through their respective counsel of record, hereby stipulate and  
24 request that this Court extend the deadline for Defendants to file their respective Replies to  
25 Plaintiff's Oppositions to Defendant's Motions for Summary Judgment (Doc 51 and Doc  
26 55) in the above captioned case, up to and including January 16, 2021.

27 This request for an extension of time is not sought for any improper purpose or  
28 other purpose of delay.

Wherefore, the parties respectfully request that this Court extend the time for Defendant to file its Reply to Plaintiff's Oppositions to Defendant's Motion for Summary Judgment (Doc 51 and Doc 55), up to and including January 16, 2021.

DATED: January 7, 2021

DATED: January 7, 2021

THE GALLIHER LAW FIRM

LEWIS BRISBOIS BISGAARD & SMITH  
LLP

/s/ Keith E. Galliher

/s/ John M. Orr

KEITH E. GALLIHER, JR., ESQ.  
Nevada Bar No.220  
1850 E. Sahara Avenue, Suite 107  
Las Vegas, Nevada 89104  
*Attorneys for Plaintiffs*

S. BRENT VOGEL  
Nevada Bar No. 6858  
JOHN M. ORR  
Nevada Bar No. 14251  
6385 S. Rainbow Boulevard, Suite 600  
Las Vegas, Nevada 89118  
Attorneys for Correct Care Solutions, LLC

DATED: January 7, 2021

/s/ John A. Curtas

BRADFORD R. JERBIC, ESQ.  
Nevada Bar No. 1056  
JOHN A. CURTAS  
Nevada Bar No. 1841  
495 S. Main Street, Sixth Floor  
Las Vegas, Nevada 89101  
*Attorneys for City of Las Vegas  
and Michele Freeman*

**IT IS SO ORDERED**

DATED: January 8, 2021

  
UNITED STATES DISTRICT JUDGE

## Rokni, Roya

---

**From:** John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Sent:** Thursday, January 7, 2021 3:53 PM  
**To:** Orr, John; Kathleen Gallagher; Keith Galliher  
**Cc:** Deena Mooney; Rokni, Roya; Cindy Kelly  
**Subject:** [EXT] RE: CCS adv Mariano

Fine with me.

### John A. Curtas

Deputy City Attorney

City Attorney's Office | Civil Division

**702-229-2125 (direct) | 702-528-7454 (cell)**

495 South Main Street, Sixth Floor | Las Vegas, NV 89101



lasvegasnevada.gov



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**From:** Orr, John <John.Orr@lewisbrisbois.com>  
**Sent:** Thursday, January 07, 2021 3:47 PM  
**To:** Kathleen Gallagher <KGallagher@galliherlawfirm.com>; Keith Galliher <KGalliher@galliherlawfirm.com>; John A. Curtas <jacurtas@LasVegasNevada.GOV>  
**Cc:** Deena Mooney <DMooney@galliherlawfirm.com>; Rokni, Roya <Roya.Rokni@lewisbrisbois.com>; Cindy Kelly <CKelly@LasVegasNevada.GOV>  
**Subject:** RE: CCS adv Mariano

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**John M. Orr**  
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**From:** Kathleen Gallagher <[KGallagher@galliherlawfirm.com](mailto:KGallagher@galliherlawfirm.com)>

**Sent:** Thursday, January 7, 2021 3:01 PM

**To:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>; Keith Galliher <[KGalliher@galliherlawfirm.com](mailto:KGalliher@galliherlawfirm.com)>

**Cc:** Deena Mooney <[DMooney@galliherlawfirm.com](mailto:DMooney@galliherlawfirm.com)>; Rokni, Roya <[Roya.Rokni@lewisbrisbois.com](mailto:Roya.Rokni@lewisbrisbois.com)>

**Subject:** [EXT] Re: CCS adv Mariano

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Of course. Send over the stip.

**Kathleen H. Gallagher, Esq.**

Of Counsel

THE GALLIHER LAW FIRM

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Las Vegas, Nevada 89104

[kgallagher@galliherlawfirm.com](mailto:kgallagher@galliherlawfirm.com)

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**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>

**Sent:** Thursday, January 7, 2021 2:48 PM

**To:** Keith Galliher; Kathleen Gallagher

**Cc:** Deena Mooney; Rokni, Roya

**Subject:** CCS adv Mariano

Hi Keith and Kathleen

I hope you both are well and enjoyed the holidays. I'm writing to request just until Jan 16, to submit our reply to the pending MSJ. It's currently due on Jan 11. I hate to ask for another extension, but I'm up against a few other tight deadlines. I appreciate your courtesy. Please let me know, and I'll circulate a stip. Thank you, so much.

Sent from my iPhone



**John M. Orr**

**Attorney**

[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)

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## Rokni, Roya

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**From:** Orr, John  
**Sent:** Thursday, January 7, 2021 4:26 PM  
**To:** Rokni, Roya  
**Subject:** FW: CCS adv Mariano

**John M. Orr**  
**Attorney**  
Las Vegas Rainbow  
702.693.4352 or x7024352

---

**From:** Keith Galliher <KGalliher@galliherlawfirm.com>  
**Sent:** Thursday, January 7, 2021 4:28 PM  
**To:** Orr, John <John.Orr@lewisbrisbois.com>  
**Subject:** [EXT] Re: CCS adv Mariano

John: You may esign for me.

---

**From:** Orr, John <[John.Orr@lewisbrisbois.com](mailto:John.Orr@lewisbrisbois.com)>  
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Cc: Deena Mooney <[DMooney@galliherlawfirm.com](mailto:DMooney@galliherlawfirm.com)>; Rokni, Roya <[Roya.Rokni@lewisbrisbois.com](mailto:Roya.Rokni@lewisbrisbois.com)>

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**Kathleen H. Gallagher, Esq.**

Of Counsel

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Sent from my iPhone



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